



Republican State Committee of Pennsylvania

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REPUBLICAN STATE COMMITTEE OF PENNSYLVANIA

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August 28, 1991

Mr. Lawrence Noble, General Counsel
Federal Election Commission
999 F Street N.W.
Washington, D.C. 20463

AOR 1991-25
SUPPLEMENT

Dear Mr. Noble:

On behalf of the Republican Party of Pennsylvania, I would like to offer the following observations relative to AOR 1991/25 and the proposed amendments to AOR 1991/25.

- 1) Under AOR 1991/25 the allocation formula is stated as 3/7 or 43% Federal and 57% non-Federal (a formula derived based on no allocation for local elections). We believe the proposed amendment clearly addresses the fact that in Pennsylvania local elections are held in the "off-year" and thus places Pennsylvania in the same category as the five states specifically mentioned in the regulations. We would concur with the proposed 3/8 allocation formula.
- 2) We also agree with the proposed amendment that would permit the 3/8 allocation formula to be used on State Party administrative and over-head expenses rather than the 50/50 allocation as proposed in AOR 1991/25. Based upon the 1991 local elections, as well as two partisan state-wide Judicial elections, the Republican Party of Pennsylvania had prepared a detailed 1991 budget, and the overhead and administrative expenses outlined in that budget will not be increased due to the Special Election necessitated by the tragic death of Senator Heinz.
- 3) Additionally, we feel strongly on an issue not addressed in the proposed amendment. In AOR 1991/25 the proposed effective date for an allocation formula based upon the Special Election would be May 1, 1991. The question must be raised as to the validity of this date in light of the fact that the Republican Party of Pennsylvania

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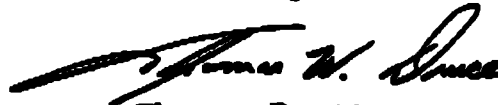
Blaine A. Brown
Deputy Chairman

Elise H. Hillman
National Committeewoman

has not nominated a candidate for this election and will not do so until August 30, 1991.

We hope these observations will be helpful to you and the Commission in reaching a final decision, and are most appreciative of the time and diligence being put forth on this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Thomas W. Druce". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Thomas Druce
Executive Director